

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In Re:)	Chapter 13
)	
JOSEPH AUGER)	
)	Case No. 23-40209
)	
Debtor)	

MOTION TO EMPLOY REAL ESTATE BROKER

The above debtor (the “Debtor”), hereby requests the entry of an order employing:

Mitra Ghobadi
Home Realty
85 Curtis Avenue
Stoughton, MA 02072

as real estate broker for the debtor and to pay such broker a commission of four percent 4% of the gross sale price. In support of such Motion, the Debtor states as follows:

1. The Debtor owns the property at 9 Englewood Road, Worcester, Massachusetts (the "real estate"). Relief from stay has been granted to the lender, however, the real estate can be sold prior to foreclosure.
2. The Debtor desires to sell the real estate and has seeks to employ Home Realty to sell the real estate.
3. The Debtor proposes to pay a total real estate broker's commission of four percent (4%) of the gross sale price to be shared jointly participate with it in the actual sale of the real estate as a buyer’s agent.
4. Any sale of real estate shall be subject to the prior approval of this Court pursuant to 11 USC 363, Fed. R. Bankr. P. 2002(a)(2) and 6004, and MLBR 2002-5 and 6004-1.
5. The Debtor attaches an affidavit from Mitra Ghobadi agent along with the Listing Agreement.

WHEREFORE, THE DEBTOR REQUESTS APPROVAL OF THE REAL ESTATE BROKER AS CONTEMPLATED HEREIN.

Respectfully Submitted
Debtor, by counsel,

/s/ Michael Van Dam
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Dated: July 19, 2023